

September 2, 2014

To: Don Yon, ODEQ
From: Caty Clifton, US Forest Service, Pacific Northwest Region
Subject: Informal Comments on ODEQ Draft NPS Management Program Plan
(August 4, 2014 Public Notice Request for Comments)

I appreciate the opportunity to review and comment on the ODEQ Draft NPS plan; it emphasizes cooperation and partnerships in Oregon's NPS management and recognizes the roles and responsibilities of the US Forest Service. My comments and questions are for your consideration and are offered for clarification and to improve understanding. Most could be addressed by formatting, referencing, and narrative explanation.

1. EXECUTIVE SUMMARY

Pg. 8: Last bullet what are WQ-10 and SP-12 projects and other? This is last item of a list of required plan elements. Last paragraph, last sentence what does "coordinated frameworks" mean, perhaps explain?

Pg. 10: 2nd bullet is there an example to include? EPA Key Component #3 and #4 I did not see references to the State IWRS and thought this might be an appropriate section to reference this statewide integrated strategy.

2. INTRODUCTION

Pg. 13-16: there are 4 sections of bulleted lists identified as activities, principles, priorities and "Promoting watershed protection and restoration". This could be explained and perhaps formatted to clarify what each of the lists mean and how they are related in the plan?

Pg. 13: Is the first list of bullets intended to be outputs and outcomes, or characteristics of the plan? The 2nd list of bullets are identified as guiding principles, perhaps these could be written as narrative or with more explanation?

Pg. 14: 1st bullet under Priorities, 1st sub-bullet what are the 17 water quality subprograms? 3rd bullet (Agriculture) 1st sub-bullet identifies "45 Focus areas", what are these, is there link or include map?

Pg. 15: 4th bullet (Source water protection) – identify agency/department responsible and programs that do this (SWPs)?

Pg. 16: "To Promote Watershed..." leads off another bulleted list, this section might warrant a short narrative to explain how the actions relate? The next paragraph about funding and the CNPCP seems out of place, maybe in a section called Funding for NPS activities?

3. PROGRAM DESCRIPTION

Pg. 17 3rd paragraph, are the outcomes and key actions what are shown in Table 1?

Pg. 18 Graphic is very helpful though might the subtitle "Decisions and Actions..." be considered Authorities and Programs...?

Pg. 21: 2nd complete paragraph: add a header 2013 Activities? Reorganize and move the plan completions to the end, start with "Oregon's total 2013 319-Grant allocation..." funding information first, with staff and then completion of watershed plans? The next 3 paragraphs are 2013 activities...

Pg. 22: TABLE 1 – overall this is an excellent framework for display of NPS plan components, though

“Goals” seem to be more like Components or Action Items rather than goals, and “Action/Requirements” more like Descriptions, but this could be semantics.

Pg. 23: First record “USFS/DEQ 5-Year Progress Report” should be listed under previous topic heading MAJOR NPS PLANS.

Pg. 27: Agricultural activities – “The USFS and BLM will develop and implement...” a grazing strategy – for the USFS the “strategy” already exists in required NEPA planning (LRMP and project) and related monitoring including PIBO and national BMP program, and part of FS-MOU review. The Action/Requirements could incorporate these agency requirements, and Milestone amended with MOU annual and 5 year reviews.

Pg. 28: Partnership’s. Typo and edits in first sentence. 2nd paragraph – appreciate recognition of partnerships and federal role, thank-you.

Pg. 30: Federal Agencies DEQ/USFS – typo on year should be 2014. DEQ/BLM – change USFS to BLM.

Pg. 32: What does “Create a process to develop Integrated Report that complements and supports basin planning efforts” mean; a new integrated report? Please explain and incorporate the following bulleted list as narrative explanation. We support the concept of “integrated plans” to the extent that existing plans and reports can be incorporated by reference, for example the USFS Watershed Condition Framework process, national BMP program, and WQRPs referenced in the 2014 USFS-DEQ MOU. There considerable opportunity for collaboration on basin planning efforts through USFS involvement with interagency/Tribal/Watershed Councils and other watershed-based planning and implementation activities.

Pg. 33: TMDL and WQ plans – suggest review and edit of this section. Last bullet on the page, Working with USFS...on developing their implementation plans, yes we support, just rephrase this please.

Pg. 35: In 3.4.1 Watershed Approach Basin Reports – 2nd paragraph, suggest identifying and including short narrative of the 4 basin reports completed, lessons learned, and basin reports underway? 3rd paragraph, again the reference to “17 water quality sub-programs...” are these the program areas in Fig 1? What are “...quantitative elements that describe all water quality conditions.”? 4th paragraph explain need for and purposes of LIDAR work. Is it a remote sensing technology that promises improved land and resource mapping for planning and implementing water quality programs?

Pg. 36: Section 3.4.2 1st sentence include reference to...approach (DEQ, 2012)?

Pg. 43: Section 3.4.6 EPA Plan Elements 1st paragraph states the Nine elements “...could be used” and references Table 2 which lays out EPAs watershed plan elements.

Pg. 44: would this be a new requirement for DEQ to track in updating various plans?

Pg. 46: What is “the developed guidance for these elements”? Would this be a DEQ tracking and reporting responsibility as a means of “cross-walking” EPA elements in various plans?

4. MANAGEMENT OF NPS BY LAND USE

Pg. 51: 4.1.4 The NPS Program...section seems to be a narrative description of Table 1? I am confused by use of terms “strategies” and “projects”. Clarify terminology, link with Table 1, and describe as narrative?

Pg. 52: 4th bullet “Develop and implement a programmatic strategy to address agricultural activities on federal lands, such as grazing.” See comments Pg. 27.

Pg. 54: Section 4.2, again some confusion on my part over terminology, use of “processes”, these seem to be programs.

Pg. 55: 2nd set of bullets, are these “objectives” ongoing work activities?

Pg. 58: 5th bullet – “Work with the USFS and BLM to develop a water quality-monitoring program...”

Consider instead “...to evaluate water quality monitoring programs as part of MOU implementation...”.

We consider the MOU to be our program framework and through annual coordination, the USFS identifies WQRP progress, management measures, monitoring activities and water quality effects. 7th bullet –the USFS/BLM did document and communicate in the past through coordination on previous MOUs, (i.e. 2010 FS/BLM 5 year progress report) but agree improvements are needed and BMPs are a priority. Bullets 9, 11, and 12 seem to be similar – to establish or develop a process for joint review...” do you mean BLM/FS coordination as part of the reporting and communications expectation in MOUs? Suggest clarification by referencing and emphasizing this part of agreements and encourage joint review. I agree if this is what intended, not new “processes” but coordination of existing programs. Legal Authorities, Priorities, and Objectives detailed in bulleted lists could be synopsized and incorporated by referencing the agreement (post on the web)?

Pg. 59: “The MOU identified priorities.” Confused by terminology again, Bullets 2-8 are from the Purpose section in MOU, identify as purposes as stated in MOUs, 1st bullet move and drop or rephrase this as priorities for restoration: the FS MOU does not specify closing and restoration of roads though among the management techniques and options available, this type of work occurs but is not specified in MOU. 2nd bullet is fine but among the obligations of the FS/BLM.

The next set of bullets is called “The Objectives...in the MOU...” but there are no “objectives” identified in the MOU, these may be components of the MOU that are pertinent to DEQ in reporting to EPA?

Pg. 60: Section 4.3.3.1 USFS BMPs – include intranet and reference? Use quotes where appropriate and follow the language excerpted. “The purpose ~~and objectives~~ of the USFS National BMP Program is to provide...” (USFS, 2012). ADD “The objectives of the program are:

Pg. 61: ...write as written, combine 1st and 2nd bullets...”To establish uniform direction...” 3rd and 4th are fine as written. 4th paragraph says Table 1 contains 2 examples comparing national direction with Regional and State. Which part of Table 1 does this refer to?